



**Law Offices of Bennet & Bennet, PLLC**

**Maryland**

4350 East West Highway, Suite 201  
Bethesda, Maryland 20814  
Tel: (202) 371-1500  
Fax: (202) 371-1558

**District of Columbia**

10 G Street NE, Suite 710  
Washington, DC, 20002

**Caressa D. Bennet\***

**Michael R. Bennet**

**Gregory W. Whiteaker**

**Marjorie G. Spivak\***

**Donald L. Herman, Jr. +**

**Kenneth C. Johnson‡**

**Howard S. Shapiro†**

**Daryl A. Zakov^**

**Robert A. Silverman**

**Technical Consulting Services**

**David A. Fritz**

**Judy Y. Deng**

\*Admitted in DC & PA Only

+Admitted in DC & AL Only

†Admitted in DC, VA & FL Only

‡Admitted in DC & VA Only

^Admitted in WA Only

February 20, 2008

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: CPNI Certification and Accompanying Statement  
EB Docket No. 06-36**

Dear Ms. Dortch:

Alaska Wireless Communications, LLC, by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Marjorie Spivak

cc: Telecommunications Consumers Division, Enforcement Bureau  
Best Copy and Printing, Inc.

Attachments

**Annual 47 C.F.R. §64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for the year: 2007

Date filed: February 20, 2008

Name of company covered by this certification: Alaska Wireless Communications, LLC

Form 499 Filer ID: 823038

Name of signatory: Paul Ostrander

Title of signatory: Vice President

I, Paul Ostrander, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 e. seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules

The Company has not taken any actions against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI

Signed:  [electronic signature]

### **CPNI Usage Policy Statement**

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("FCC") rules, this statement explains how Alaska Wireless Communications, LLC's (Company) operating procedures ensure compliance with Part 64, Subpart U of the FCC's rules.

The Company has chosen to prohibit the use of CPNI for marketing purposes by itself and between its affiliates.

The Company's CPNI Policy Manual includes an explanation of what CPNI is and when it may be used without customer approval.

Employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Policy Manual describes the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.

The Company has established a supervisory review process regarding Company compliance with the FCC's CPNI rules.

The Company requires affirmative written subscriber approval for the release of CPNI to third parties.

A Corporate Officer has been named as the CPNI Compliance Officer and is held responsible for annually certifying that the Company is in compliance with the FCC's CPNI rules and submitting the certification and an accompanying statement explaining how Company complies with the FCC's CPNI rules to the FCC prior to March 1.

### **Company Safeguards**

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company has safeguards in place to protect against unauthorized access to CPNI. The Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or an in-store visit.

The Company only discloses call detail information pursuant to a customer initiated telephone contact if the customer is able to provide call detail information during a customer-initiated call without Company's assistance, then Company is permitted to discuss only the call detail information provided by the customer. A customer may access call detail based on a customer-initiated telephone call, by asking Company to send the call detail information to an address of record or by the carrier calling the telephone number of record.

Company does not provide on-line account access at this time.

Company provides customers with access to CPNI at its retail locations if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

Company has procedures and policies in place to notify a customer immediately when an address of record is created or changed.

In the event of a CPNI breach, Company complies with the FCC's rules regarding notice to law enforcement and customers. Company maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two year.

#### **Actions Taken Against Data Brokers and Customer Complaints**

Company has taken no actions against data brokers in the last year. Company has received no customer complaints in the past year concerning the unauthorized released of CPNI.